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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CITY AND COUNTY OF SAN
FRANCISCO, et al.,

Plaintiffs,

v.

PURDUE PHARMA L.P., et al.,

Defendants.

Civil Case No.: 3:18-CV-07591-CRB

**DECLARATION OF ALEX J. HARRIS IN
SUPPORT OF WALGREEN CO.'S MOTION
TO EXCLUDE THE OPINIONS AND
TESTIMONY OF ELIZABETH PARK**

1 I, Alex J. Harris, hereby declare and state:

2 1. I am an attorney duly licensed to practice law in the State of Colorado and
3 admitted to practice *pro hac vice* before this Court. I am a Partner at Bartlit Beck LLP and
4 am one of the attorneys representing Defendant Walgreen Co. (“Walgreens”) in the above-
5 entitled action. I make this declaration upon personal knowledge and could and would
6 competently testify to the matters below if called to do so.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the
8 deposition transcript of Elizabeth Park in *The City and County of San Francisco, California,*
9 *et al. v. Purdue Pharma L.P., et al.*, Case No. 3:18-cv-07591), dated February 8, 2022.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the
11 Expert Report of Elizabeth Park, Pharm.D., APH in *The City and County of San Francisco,*
12 *California, et al. v. Purdue Pharma L.P., et al.*, Case No. 3:18-cv-07591), dated October 19,
13 2021.

14 4. Attached hereto as **Exhibit C** is a true and correct copy of the Opinion and
15 Order Regarding Defendants’ Motion to Exclude Opinions of James Rafalski and Craig
16 McCann issued by the United States District Court of the Northern District of Ohio in *In re:*
17 *National Prescription Opiate Litigation*, MDL 2804, Case No. 1:17-MD-2804), filed on
18 August 20, 2019.

19 5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the
20 Expert Rebuttal Report of Elizabeth Park, Pharm.D., APH in *The City and County of San*
21 *Francisco, California, et al. v. Purdue Pharma L.P., et al.*, Case No. 3:18-cv-07591), dated
22 January 21, 2022.

23 6. I declare under penalty of perjury under the laws of the State of California and
24 the United States of America that the foregoing is true and correct and that I executed this
25 Declaration on February 14, 2022, in Denver, Colorado.

Dated: February 14, 2022

Respectfully submitted,

By: /s/ Alex J. Harris

Alex J. Harris